

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**MICHAEL LYNN VAUGHN,**

**Defendant**

\*

\*

**\* CRIMINAL NO. PX-17-125**

\*

\*

\*

\*

\*\*\*\*\*

**MOTION OF THE UNITED STATES FOR A PRELIMINARY ORDER OF  
FORFEITURE, WITH SUPPORTING SUGGESTIONS**

The United States of America, through undersigned counsel, respectfully submits its Motion for a Preliminary Order of Forfeiture in the above-entitled case for the reasons set forth in the following supporting suggestions. A proposed order is submitted with this motion.

**SUPPORTING SUGGESTIONS**

1. On March 6, 2017, a federal grand jury for the District of Maryland returned an indictment charging the defendant with conspiracy to commit bribery, substantive bribery, and wire fraud. ECF No. 1. The indictment included a forfeiture allegation informing the defendant that the Government would seek to forfeit any property, real and personal, which constitutes and is derived from proceeds traceable to the violations. ECF No. 497 at 19.

2. The defendant proceeded to trial on the conspiracy and bribery counts in the indictment on February 15, 2018. On March 1, 2018, the trial jury returned a verdict in which the defendant was found guilty of all conspiracy and bribery counts.

3. Accordingly, the United States now moves pursuant to Rule 32.2(b) of the Federal Rules of Criminal Procedure for the entry of a Preliminary Order of Forfeiture in the form attached hereto.

4. Based on the evidence set forth in the indictment and at trial, as supplemented by any sentencing presentation, the United States has established the requisite basis for the forfeiture of the property identified in the attached proposed order.

WHEREFORE, the United States respectfully requests that the Court enter a Preliminary Order of Forfeiture and to order the United States Marshals Service to seize and maintain custody of the forfeited property and dispose of it in accordance with the law.

Respectfully submitted,

Robert K. Hur  
United States Attorney

By: /s/Thomas P. Windom  
Thomas P. Windom  
Assistant United States Attorney